

Cr. No. **23-CR-118**
(T. 21, U.S.C., §§ 841(b)(1)(C), 846,
853(a), 853(p), [REDACTED]
[REDACTED]; T. 18, U.S.C., §§
[REDACTED] and 3551 et seq.)

~~CONFIDENTIAL~~

[illegible]

COUNT TWO

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine)

2. In or about November 2022, within the Eastern District of New York and elsewhere, the defendants RASHAWNEE GRAY and [REDACTED], together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendants charged in Counts One and Two that, upon their conviction of either such offenses, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a) and 970, which require any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a), 853(p) and 970)

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2021R00552
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT
EASTERN *District of* NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RASHAWNEE GRAY and [REDACTED],

Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841(b)(1)(C), 846, 853(a), 853(p), [REDACTED]
[REDACTED]; T. 18, U.S.C., §§ [REDACTED] 3551 et seq.)

A true bill.

Thomas J. Paradio
Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Andrew D. Wang, Assistant U.S. Attorney
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